New and Redevelopment Performance Standard Table[1]
Options for Municipal Regional Permit
(For Steering Committee Meeting on April 24, 2006)

Best Management Practices[2]	Level of Implementation	Options for MRP
C.3.a: Performance Standard Implementation.	Programs' guidance and education outreach materials are completed and updated as needed. Co-permittees are implementing performance standards (PS). Some PS have been replaced with C.3. specific provisions and guidance manuals. Co-permittees have revised ordinances and policies as needed to meet C.3. requirements.	All agreed to: Keep pertinent language from current permits' Provisions C.3.a, b, j, k, l, m., requiring: a. (C.3.a.) Adequate legal authority to implement the requirements of C.3. and require developers of sites $\geq$ 1 acre to demonstrate coverage under the State's General Construction Permit and all developers to implement effective erosion and sediment control plans; b. (C.3.b.) Adequate permitting procedures and conditions of approval. For projects discharging directly to 303(d) listed water bodies, conditions of approval must require that post-project runoff does not exceed pre-project levels for such pollutants that are listed; c. (C.3.m.) When conducting environmental reviews, such as CEQA, evaluation of water quality effects and identification of appropriate mitigation measures; d. (C.3.a.) Adequate training for staff including inter-

[1] This table was prepared in accordance with the process agreed to by BASMAA and Water Board staff for Municipal Regional Permit Work Groups. However, because the new and redevelopment requirements (Provision C.3.) are more prescriptive than other Program elements, it made sense to relate level of implementation to specific sections of C.3. rather than performance standards.

[2] See Order R2-2003-0022 amending the Contra Costa Countywide NPDES Stormwater Permit for a complete description of each provision or best management practice listed in this column. The Alameda, San Mateo, and Fairfield-Suisun C.3 provisions are almost identical to Contra Costa's (Fairfield-Suisun has different implementation dates). There are minor differences in the Santa Clara C.3. Provision; these differences are noted in column 2 where necessary for clarification. This table does not reflect the BMPs or implementation levels for the Vallejo Sanitation and Flood Control District.

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		departmental training; e. (C.3.a.) Adequate outreach, including providing education materials to municipal staff, developers, contractors, construction sites operators, and owner/builders, early in the planning process and as appropriate; f. (C.3.a.) Access to treatment measures by Mosquito and Vector Control Agency staff. g. (C.3.j.) Adequate site design standards and guidance that call for minimizing land disturbance and impervious surfaces (especially parking lots); clustering of structures and pavement; disconnecting roof downspouts; use of microdetention, including landscape detention; preservation of high-quality open space; maintenance and/or restoration of riparian areas and wetlands as project amenities; h. (C.3.k.) Adequate source control requirements to limit pollutant generation, discharge, and runoff, to the maximum extent practicable, including indoor mat/equipment wash racks for restaurants, or covered outdoor wash racks plumbed to the sanitary sewer; covered trash and food compactor enclosures with a sanitary sewer connection for dumpster drips; sanitary sewer drains for swimming pools; sanitary drained outdoor covered wash areas for vehicles, equipment, and accessories; sanitary sewer drain connections to take fire sprinkler test water; storm drain system stenciling; landscaping that minimizes irrigation and runoff, promotes surface infiltration where appropriate, and minimizes the use of pesticides and fertilizers; and appropriate covers, drains, and storage precautions for outdoor material storage

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		areas, loading docks, repair/maintenance bays, and fueling areas. i. (C.3.l.) Revisions to General Plans, as necessary, to incorporate water quality and watershed protection principles and policies and to require implementation of the measures required by Provision C.3. for regulated development projects.
C.3.b: Development Project Approval Process	Co-permittees have modified their project review processes to incorporate C.3. requirements, and will soon incorporate limitations on increases in runoff flows and volume into their project review processes prior to the implementation deadline.	1. See entry for C.3.a.and the concept of removing impediments (all agree).
C.3.c: Applicable Projects – New and Redevelopment Project Categories	Group 1(1 acre or more of new/replaced impervious surface): Co-permittees are implementing the C.3 Provisions for Group 1 Projects, including permitted exemptions.[i (see last page of table)] Group 2 (10,000 sq.ft. or more of new/replaced impervious surface): Santa Clara Co-permittees began implementing the C.3 Provisions for Group 2A projects on October 20, 2005.[ii (see last page of table)] Santa	1. Update language to reflect the 10,000 sq.ft. threshold; maintain current size thresholds; include provision to collect and analyze impervious surface data over the term of the permit to evaluate future size thresholds. (BASMAA) 2. Encourage exploration of varied methods of increasing infiltration: Permittees have the choice of lowering the threshold to 5000 square feet or adopting one or more measures[3] that will

[3] Examples of possible alternatives to lowering the threshold (not exhaustive or final):

1. Adopt an ordinance requiring minimum pervious surfaces for all or most categories of land use. These may vary by type (e.g. hillside, single- or multi-family, commercial) and may allow treatment of runoff as an alternative (e.g. in downtown areas or for business or areas where infiltration is undesirable).
2. Require, or create strong positive incentives for, disconnection of residential roof leaders so that they drain onto landscaped areas or other permeable surfaces, including dry wells and French or Dutch drains, or into cisterns or similar storage. This could include exceptions for slide areas, drainage too close to foundations, etc.
3. Ban impermeable surfacing of parking strips and medians. Create strong positive incentives for such things as rain gardens, depressed planting strips and medians (esplanades), or curb extensions with permeable surfacing.
4. Require, or create strong positive incentives for, permeability or adequate treatment for all new and replacement parking areas and driveways, commercial and residential. This may include reductions in widths of driveways or size of parking spaces, and/or requirements that all parking spaces above minimum requirements be permeable.

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	Clara Co-permittees will begin implementing Group 2B projects and most other Co-permittees will begin implementing Group 2 projects on August 15, 2006. Fairfield Suisun will begin implementing Group 2 projects on October 16, 2006.	substantially increase treatment and infiltration. Permittees that have already adopted such measures during the current/previous permit period do not need to take further steps. (NGO) 3. Evaluate existing impervious surface data and determine during MRP permit development whether the threshold should be reduced to 1000-5000 sq.ft. If so, set a time schedule for implementation of this new threshold in the 3rd year of the permit term. Have all dischargers collect and submit impervious data for the first two years of the permit term. Based on the data, WB will determine whether the threshold should be adjusted up or down. Require Dischargers to develop standard specifications for lot-scale treatment measures (e.g., for roof runoff and paved areas) within the first 3 years of the permit term. (WB) 4. Lower the threshold at the beginning of the permit to 500 sq.ft. (NGO)

5. Require, or create strong positive incentives for, permeable decks, patios, part of driveways, and sidewalks (public and private), including replacements.
6. Ban direct roof, yard, and sump drains to creeks, or storm drains that flow to creeks AND enforce the ban on existing drains as well as proposed new ones;
7. In built-out areas, retrofit some significant number of storm drains (volume of storm water) emptying to creeks, lakes, or the Bay, and/or restore or create buffers for some appropriate length of shoreline.
8. Require that all projects follow a hierarchy for stormwater treatment design that puts a premium on on-site surface infiltration (with appropriate exceptions) and requires alternative pollution control for high-use streets and parking lots, etc., AND for flow to pipes or streams. Require that projects too small for controls, or where controls are impractical, pay into a fund for combined controls.
9. Set up a fund for combined controls, or begin specific projects, that developers of smart-growth, transit-village, brownfields, infill, or low-income projects, and/or projects too small for controls, can pay into if expected costs of treatment BMPS exceed 1% or 2% of construction costs.
10. Create significant multi-purpose treatment areas, e.g. treatment marshes used for recreation or wildlife.

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C.3.c. – Single family home requirements	All stormwater programs are implementing the following requirement: "Construction of one single family home, which is not part of a larger common plan of development, with the incorporation of appropriate pollutant source control and design measures, and using landscaping to appropriately treat runoff from roof and house-associated impervious surfaces (e.g., runoff from roofs, patios, driveways, sidewalks and similar surfaces), would be in substantial compliance with Provisions C.3." Threshold for exemption from full implementation of C.3. varies by permit (1 acre of impervious surface in the CCCWP, ACCWP, and STOPPP permits; 10,000 square feet in the SCVURPPP permit).	1. Keep current single-family home requirements (source control, site design, and treatment in landscaping) for projects with 1 acre or more of impervious surface (BASMAA). 2. Keep current single-family home requirements (source control, site design, and treatment in landscaping) for projects at and above the threshold defined in C.3.c (changes as threshold changes) [NGO]. 3. Require single-family homes at or above the impervious surface threshold (to be defined in C.3.c.) to implement one or more BMPs from a list of options (to be determined and specified in the permit). (WB) 4. Require full implementation of C.3.d. for single-family homes above size threshold (defined in C.3.c) except that City inspections would not be required. (NGO)
C.3.d: Numeric Sizing Criteria for Pollutant Removal Treatment Systems	Co-permittees have completed guidance and are requiring treatment BMPs to be constructed according to numeric sizing criteria.	1. Incorporate the following changes in the first paragraph of Provision C.3.d. to allow a combined flow/volume criterion and further clarify link between treatment and site design/hydrologic source control measures (additions shown in bold): "All Dischargers shall require that treatment measures**, or measures to disperse and infiltrate runoff from impervious areas,** be constructed for applicable projects, as defined in Provision C.3.c, that incorporate, at a minimum, the following hydraulic sizing design criteria **or equivalent criteria to achieve treatment of 80% of total runoff over the life of the project**. As appropriate for each criterion, the Dischargers shall use or appropriately analyze local rainfall data to be used for that criterion." (BASMAA)

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		2. WB is considering Option 1 with possible requirement for continuous simulation modeling.
C.3.e: Operation and Maintenance of Treatment Measures	Programs have developed BMP O&M and verification program guidance materials, which includes design guidance for treatment measures to prevent the production of vectors. Co-permittees are implementing operation and maintenance verification programs. Inspections are just beginning as Group 1 projects complete construction. Co-permittees have begun reporting on Treatment BMP O&M Verification Program activities as of Fall 2005. **Individual Program Details or Variations** Permits vary on vector control plan requirements but all programs are working with vector control agencies and incorporating vector controls into BMP designs and maintenance requirements. All permits contain the following "safe harbor" language (as Finding #16 in SCVURPPP's 7/05 permit amendment and Provision C.3.e.v. in the other permits): "The Dischargers are expected to work diligently and in good faith with the appropriate agencies to obtain any approvals necessary to complete maintenance activities for treatment controls. If the Dischargers have done so, when necessary and where maintenance approvals are not granted by the agencies, the Dischargers shall be considered by the Board to be in compliance with Provision C.3.e of the Permit."	All agreed that we need to address resolution of BMP maintenance/endangered species issue. 1. No change from current language, other than making language consistent (there are currently small differences in language) and specifying continuing coordination with vector control agencies. (BASMAA) Current language requires: a. Compiling a list of properties and responsible operators; b. Inspecting a subset of prioritized treatment measures with appropriate follow-up and correction; c. Requiring signed statements from private and public entities accepting O&M responsibility and granting access permission. Until the BMP maintenance/endangered species issue is resolved, maintain the "safe harbor" language stated in column 2 above as a provision in the permit (BASMAA). 2. Change current language to specify minimum contents of BMP O&M program, priorities for inspection and frequency of inspection, reporting requirements, and vector control agency coordination. Intend to specify that a minimum percentage (20%) of the total number of facilities must be inspected per year and a minimum percentage of the total facilities using vault systems must be inspected. (WB)
C.3.f: Limitations on	Programs have submitted HMP Work Plans and draft	1. **(BASMAA):**

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Increase of Peak Stormwater Runoff Discharge Rates	and final HMPs. **Individual Program Details or Variations** HMPs and implementation dates vary. Santa Clara's HMP has been approved and adopted as a permit amendment on an interim basis. Implementation began October 20, 2005. Other programs' HMPs have yet to be approved. Design standards and applicability criteria also vary among HMPs.	a. Retain the existing basic "rules" in C.3.f: • Threshold is one acre of new/replaced impervious area[4] (i.e. Group 1 projects). • Standard is no increase in runoff peaks, volumes or durations from existing (pre-project) site condition, where such increases would cause increased erosion or other impacts to beneficial uses of receiving streams. • No requirements for sites discharging to hardened channels or tidally influenced areas. • No requirements if impervious area is not increased. b. Each Program should be allowed to implement its respective HMP as long as there is "a level playing field" throughout the Region in terms of standards and applicability. c. Each Program will commit to effectiveness evaluation and continuous improvement of its HMP over the term of the MRP. d. The existing permit language should be changed only to reflect the current status of preparation and implementation of the HMPs. **2. NGO A** Retain existing basic "rules" in Santa Clara C.3.f with

[4] Under C.3.f. in current permits, the area of impervious surface created and/or replaced is used to determine if the project is a Group 1 project. If so, then there is a determination if there is an increase in peak flow, volume or duration that needs to be mitigated. That is, if all of the impervious surface was replacement of what was there before, then no hydromodification controls are needed (just treatment). If some of the impervious surface was created, then there is an increase in peak flow, volume or duration, so hydromodification for the increased flows must be addressed.

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		changes to begin to reduce existing extreme flows through redevelopment requirements: • Use the applicable Group 1 or 2 thresholds of each existing permit for the area covered by that permit. • No requirements for channels hardened all the way to the Bay, or streams whose dry-weather elevation is mean higher high tide or lower, unless such increases would cause impacts to beneficial uses of receiving streams, including impacts on anadromous or special-status species, or would increase flooding that endangers property or life. • The general standard for new development is no increase in runoff peaks, volumes, or durations from existing (pre-project) site condition, where such increases would cause increased erosion or other impacts to beneficial uses of receiving streams. • For projects redeveloping impermeable surface areas greater than 50% of the threshold, phase in requirements that significantly reduce runoff peaks, volumes, and/or durations from existing (pre-project) site condition. Allow variation among local programs to achieve this goal. Exceptions for impracticability apply, as spelled out in Alternative Compliance. • Require one HM monitoring project per Program (except Vallejo), or cooperation on 3 region-wide projects. **3. WB A: Based on existing HMPs and requirements**: • All new and redevelopment projects that create or replace one acre or more of impervious surface

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		shall implement hydromodification (HM) controls. • Sites ≤ X acres may use either a continuous simulation model to size their HM controls or use the sizing charts (*considering CCCWP's and/or F-S's, and their adaptability to other counties)* • Sites > X acres must use a continuous simulation model that meets the performance standards below: o Continuous simulation model using at least 30 years of local rainfall data, and pre- and post-project flow duration matching will include the entire rainfall period of record. o The HM unit is sized, and the allowable low-flow discharge rate is thus, that the runoff from the site will not increase the erosion potential of the receiving water body. Lacking other data, allowable low-flow will be 0.1Q2. o The post-project flow duration curve shall not deviate above the pre-project flow duration curve by more than 10% over more than 10% of the length of the curve • Reference each Program's HMP and its status (adopted or not). Establish consistencies where needed in the MRP, such as better define exempt areas • Require one HM monitoring project per Program (except Vallejo), or cooperation on 3 region-wide projects. **4. WB B Based on Reducing Erosive Flows Relative to Existing Flows** • Same as WB Option A, but add a time schedule for Programs to revise their HMPs so that erosive flows from redevelopment projects are managed as follows: Unless the project can demonstrate there

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		are no high risk (perhaps using CCCWP's risk classification) reaches between the project and the Bay, redevelopment projects must model post-project runoff using 50% of the project's (post-project) impervious surface. **UU4. NGO B. Focus on maintaining moderate flows in less developed areas; largely exempt built-out areas.** • **Projects discharging to headwaters**, [insert grade or other definition] including all catchments with less than 25% impermeable surface, regardless of grade: All new and redevelopment projects, of any size, shall implement HM controls. Redevelopment projects of some workable size – say 5000 square feet -- decrease impervious surface by 25% or implement HM controls that reduce post-project flows as in WB Option B (phase in requirements for reduction) for the redeveloped area. Those projects with up to 5000 sq.ft. impervious surface may use sizing charts for HM controls. Larger projects shall use continuous simulation model. Implement in 1year. • **Projects discharging to transition zone**, [insert grade or other definition] including all catchments with 25% - 70% impermeable surface, regardless of grade: All new development projects of one acre or more of impervious surface shall implement HM controls. All redevelopment projects of 1 acre or more impervious surface shall decrease impervious surface by 25 %, or implement HM controls that reduce post-project flows as in WB Option B (phase in requirements for reduction)for the entire redeveloped area. Implement in 2 years.

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		• **Projects discharging to flat or built-out zone**, defined as including tidally influenced reaches of streams (dry-weather water elevation at or below mean higher high tide) and catchments with 70% or greater impervious surface are excluded from HM requirements, except where evidence exists of anadromous fish or special-status species that might be adversely affected by volume or speed of water flows, or where there is evidence of flooding. Where evidence of flooding or of special-status species as described exists, dischargers shall propose appropriate treatment in their HMP plans. If these plans have not been accepted by the Board, such projects shall follow the rules for projects discharging to the transition zone. • Require one HM monitoring project per Program (except Vallejo), or cooperation on 3 region-wide projects.
C.3.g: Alternative Compliance Based on Impracticability of Requiring Compensatory Mitigation	To be implemented at Co-permittees' option. **Santa Clara** Milpitas, San Jose and Sunnyvale have created alternative compliance programs. Water Board staff have made comments, and cities have responded. Programs have not been brought to the Water Board for approval (not required under existing SCVURPPP permit).	**1. (BASMAA):** • Maintain the intent and approach of the current permit and allow flexibility for some variation among local programs as needed for their community characteristics. • Municipalities should not be required to find that on-site treatment is impracticable before granting a project proponent the option of equivalent off-site treatment. [In the current permit, applicants may choose a regional treatment option without needing to show on-site treatment is impracticable]. • If an alternative compliance program is prescribed

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		in the permit, then allow individual municipalities to bring local compliance programs to the Water Board for approval. **2. (NGO):** Simplify requirements and allow for variation among local programs while retaining a preference for on-site or nearby treatment. **See attached flow chart.** Under this option, no special treatment for brownfields, low-income, transit villages, etc.; related C.3.f NGO Option B largely exempts highly urbanized catchments where most of these occur. **3. (WB):** C.3.g. will be the alternative compliance option for facilities that cannot install treatment onsite. Programs will no longer have the option to develop individual alternative compliance programs. All alternative compliance programs previously approved by the EO will be superseded by the MRP. **See attached flow chart.** **4. (NGO) If special treatment for brownfields, etc. retained:** • Use EPA definition but project must receive subsidy or similar benefits under a program designed to redevelop such sites. • Low-income applies proportionally to % of project that is actually low-income or similarly subsidized housing.
C.3.h: Alternative Certification of	To be implemented at Co-permittees' option. Co-permittees are beginning to use or are considering	Keep current language which requires that in lieu of conducting detailed review to verify the adequacy of

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Adherence to Design Criteria for Stormwater Treatment Measures	this option. BASMAA has developed a list of qualified engineering firms.	measures required pursuant to Provisions C.3.d, a Discharger may elect to accept a signed certification from a Civil Engineer or a Licensed Architect or Landscape Architect registered in the State of California, or another Discharger that has overlapping jurisdictional project permitting authority, that the plan meets the criteria established herein (all agree).
C.3.j: Site Design Measures Guidance and Standards Development	Programs have developed materials and guidance related to site design standards. Co-permittees have reviewed their local design standards and guidance, identified revision opportunities, and report on these activities and implementation work plans to the Water Board annually. **Individual Program Details or Variations** Implementation dates vary, but all dates have passed (i.e., Co-permittees should be implementing appropriate changes now.)	See entry for C.3.a.
C.3.k: Source Control Measures Guidance Development	Programs have completed guidance on and lists of recommended source control measures. Co-permittees have developed and are implementing source control requirements for new and redevelopments projects.	Incorporate source control language into C.3.a.

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C.3.l: Update General Plans	Programs have provided guidance on example language for General Plan updates. Co-permittees have sufficient General Plan language to implement C.3. and are incorporating any additional modifications during regularly scheduled General Plan updates.	See entry for C.3.a.
C.3.m: Water Quality Review Process	Programs' guidance is complete. Co-permittees are evaluating water quality effects and identifying appropriate mitigation measures when conducting environmental reviews of new development and redevelopment projects.	See entry for C.3.a
C.3.n: Reporting	Programs' guidance is complete and updated annually. Co-permittees are annually reporting project specific data in accordance with Provision C.3.n. <u>Data required under C.3.n. for each project under C.3.c.:</u> --Project name, project type, site size, quantity of new impervious surface --Site design, source control, treatment (and flow control) BMPs used, numeric sizing criteria used, O&M mechanism, responsible party	Require the following be reported: **C.3.a. (NGO)** : A report shall be produced on what changes permittees have actually made to ordinances, regulations, or procedures to facilitate treatment of nonpoint runoff and lessening of hydromodification. **C.3.a. (BASMAA):** Continue to report on these items as part of general effectiveness evaluation (see below). **C.3.c. (WB):** Tabular form with the following headings (see sample tables and instructions for tables): • Project Name, Number, Street Address, and Location (cross street). • Name of Developer, Phase No. (if project is being

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	--Summary of types of pesticide reduction measures required, and percent of projects for which pesticide reduction measures required (SCVURPPP and ACCWP only).	constructed in Phases, each Phase should have a separate entry), Project Type (e.g., commercial, industrial, residential multi-unit, single-family residential), and description. • Project watershed. • Site Acreage (or square footage of land disturbance). • New or replaced impervious surface area. • Status of Project (e.g., application date, application deemed complete date, project approval date). • Source control measures BMPs. • Site design measures BMPs. • Post construction treatment BMPs onsite. • Hydraulic Sizing Criteria used. • Alternative Compliance o Basis of impracticability used o Alternative Compliance Measures included (if Regional Project, provide summary of Project (goals, duration, total estimated costs) • HMP – If not required, state why not. If required, state control method used and attach pre- and post-project hydrographs. • Operation & maintenance responsibility mechanism. • Pesticide Reduction Measures included in Project. **C.3.c. (BASMAA):** Tabular form OK, but keep current reporting requirements and eliminate the following: • Alternative compliance – should not need to state basis of impracticability (see BASMAA option for C.3.g.) • HMP – should not need to attach pre- and post-project flow duration curves to a summary table

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	Current reporting requirements under C.3.e. require the annual report to contain: • A description of the organizational structure of the Discharger's O&M Verification Program; • An evaluation of that O&M Verification Program's effectiveness; • Summary of any planned improvements to the O&M Verification Program; • A list or summary of treatment measures that have been inspected that year with inspection results.	**C.3.c. (WB)** Reporting requirements for new/replaced impervious surface from small (< thresholds in C.3.c.) projects. **C.3.c. (WB)** Reporting requirements for source control, site design, and any treatment measures installed for single-family homes. **C.3.e (WB)**: Tabular Form with the following Headings (see attached table): • Facility/site inspected during the reporting period and Responsible Party for O&M. • Date(s) of inspection. • Type of inspection (e.g., annual, follow-up, spot). • Type(s) of BMPs inspected. • Compliance status (e.g., compliance, non-compliance/violation). • Enforcement action(s) taken (e.g., verbal warning, notice of violation, administrative citation, administrative order). • Comments. **C.3.e. (BASMAA):** Prefer to report a summary of BMPs inspected and inspection results, per existing permit language. If detailed information on each inspection is required: • Table should contain only inspections conducted during a particular fiscal year; • Eliminate reporting of compliance status – providing enforcement actions and comments is sufficient.

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		• As the number of BMPs to be inspected annually will increase with time, include provision to reevaluate reporting requirements, in terms of level of effort for municipalities and usefulness of data to WB staff, after a period of time (3 years?) **General Requirement (WB):** • Report on: o Overall compliance rate/percentage for facilities inspected for O&M. o Compliance rate/percentage for specific types of facilities or BMPs inspected. o Comparison of the compliance rates/percentages over time to see if there is improvement. • Discussion of effectiveness of program. • Proposed changes to improve program (e.g., changes in prioritization scheme for frequency of O&M inspections, changes to improve effectiveness of program). **General Requirement (BASMAA):** Include evaluation of effectiveness and proposing changes for improvement, as long as methods of evaluation are expressed as guidance and not prescribed.
C.3.o: Implementation Schedule	Co-permittees are following the implementation schedule, although implementation timeline for HMP requirements is dependent on Water Board review schedule. **<u>Individual Program Details or Variations</u>** Implementation dates vary, but all provisions (with	Not needed (all agree).

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	possible exception of HMP) will likely be into implementation phase by adoption date of MRP.	

[i] Group 1 Project exemptions include:

- Construction of one single-family home that is not part of a larger common plan of development, with the incorporation of appropriate pollutant source control and design measures, and using landscaping to appropriately treat runoff from roof and house-associated impervious surfaces (e.g., runoff from roofs, patios, driveways, sidewalks, and similar surfaces).
- Sidewalks, bicycle lanes, trails, bridge accessories, guardrails, and landscape features that are part of a street, road, highway or freeway project.
- Interior remodels and routine maintenance or repair, such as roof or exterior surface replacement, pavement resurfacing, repaving and road pavement structural section rehabilitation within the existing footprint, and any other reconstruction work within a public street or road right-of-way where both sides of that right-of-way are developed.

[ii] Santa Clara Group 2A Projects meet the minimum threshold requirement of creating or replacing ≥ 10,000 sq ft of impervious surface and can be classified as one of four industrial/commercial land use activities where potential pollutant loading cannot be satisfactorily mitigated by post-construction source control and site design practices.